

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

IN RE:	§	
	§	
SCOTT VINCENT VAN DYKE	§	CASE NO. 21-60052
	§	CHAPTER 7
	§	
DEBTOR	§	JUDGE CHRISTOPHER M. LOPEZ

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

**TO THE CLERK OF THE BANKRUPTCY COURT, DEBTOR, CERTAIN CREDITORS,
AND THEIR ATTORNEYS OF RECORD, AND THE UNITED STATES TRUSTEE:**

PLEASE TAKE NOTICE that Husch Blackwell LLP hereby enters its appearance as proposed General Counsel for Catherine Stone Curtis, Chapter 7 Trustee (“Trustee”) of the above-styled bankruptcy case (the “**Bankruptcy Case**”), pursuant to the United States Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9010.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007, and 9010, the undersigned counsel hereby requests that all notices given or required to be given in the Bankruptcy Case including, but not limited to, all papers filed and served in all adversary proceedings in the Bankruptcy Case, and all notices mailed only to statutory committees or their authorized agents or to creditors and equity security holders who file with the court a request that all notices be mailed to them, be given to and served at the following address, email, telephone and/or fax number:

Lynn Hamilton Butler
lynn.butler@huschblackwell.com
HUSCH BLACKWELL LLP
111 Congress Avenue, Suite 1400
Austin, Texas 78701
(512) 479-9758
(512) 479-1101

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in Federal Rule of Bankruptcy Procedure 2002, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, email, hand-delivery, telephone, fax transmission, or otherwise filed in or made with regard to this case and any proceeding commenced herein.

PLEASE TAKE FURTHER NOTICE that the foregoing simply constitutes a request for service of papers and does not constitute consent to the jurisdiction of the Bankruptcy Court or a waiver of the right to a jury trial. Further, this request for notice does not waive Trustee's:

- a) Right to have any and all final orders for any and all non-core matters entered only after a *de novo* review by a United States District Court;
- b) Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as "core proceedings" pursuant to 28 U.S.C. § 157 and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) Right to have the reference of any matter withdrawn by the United States District Court in any manner or proceeding subject to mandatory or discretionary withdrawal; and
- d) Other rights, claims, actions, setoffs, recoupments, or other matters to which Trustee is entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by Trustee without exception and are not waived, confessed, or conceded by filing this notice or by any other participation in this matter.

Dated: April 25, 2022

Respectfully submitted,

HUSCH BLACKWELL LLP

By: /s/ Lynn Hamilton Butler

Lynn Hamilton Butler

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**PROPOSED GENERAL COUNSEL TO
CATHERINE STONE CURTIS,
CHAPTER 7 TRUSTEE**

CERTIFICATE OF SERVICE

I certify that on the 25th day of April 2022, a true and correct copy of the foregoing was served on all parties registered to receive notice through this Court's CM-ECF system.

/s/ Lynn Hamilton Butler

Lynn Hamilton Butler